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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

NICHOLLE VANNUCCI, ELLEN BROWN,  
and SHANNON HALL, individuals; and  
HOMELESS ACTION!, an unincorporated  
association,

Plaintiffs,

vs.

COUNTY OF SONOMA, SONOMA  
COUNTY COMMUNITY DEVELOPMENT  
COMMISSION, CITY OF SANTA ROSA,  
Does 1 to 10, et al.,

Defendants.

Case No. 18-CV-01955-VC

**JOINT CASE MANAGEMENT  
STATEMENT**

Judge: Hon. Vince Chhabria

Case Management Conference: November 17,  
2020, 12:45 p.m.

Plaintiffs NICHOLLE VANNUCCI, ELLEN BROWN, and SHANNON HALL, as individuals, and HOMELESS ACTION!, an unincorporated association (Plaintiffs) and Defendants COUNTY OF SONOMA, SONOMA COUNTY COMMUNITY DEVELOPMENT COMMISSION, and CITY OF SANTA ROSA (Defendants) submit this Joint Case Management Statement in advance of the November 17, 2020, Case Management Conference to discuss whether an evidentiary hearing is needed for Plaintiffs' motion to enforce and clarify the Preliminary Stipulated Injunction in this case.

**Plaintiffs' Position**

Plaintiffs believe that the briefing and documentary evidence before the Court, including Plaintiffs' Reply due November 12, 2020, will provide sufficient basis for the Court to grant the relief sought in Plaintiffs' motion.

Plaintiffs would also like to discuss the Injunction's expiration on December 31, 2020. Since the parties have not yet reached a long-term resolution of this case, Plaintiffs suggest an additional sixth-month extension of the Preliminary Stipulated Injunction, as well as a mediation session to be scheduled after the Court has ruled on Plaintiffs' motion. Plaintiffs proposed the extension and mediation to Defendants via email on Monday, November 2, 2020.

**Defendant City of Santa Rosa's Position**

Defendant City believes that an evidentiary hearing is necessary if the plaintiffs seek or the court is inclined to make a finding that an individual officer acted in disregard of a court order. In that event, we would wish to cross examine the plaintiffs' witness, present the officer's testimony and, if available, submit body worn camera video. As it does not seem that plaintiffs seek such a finding and only seek clarification going forward, defendant City does not see a need for an evidentiary hearing.

As to an extension of the Injunction for an additional six months after the current expiration date on December 31, defendant City may well opt to do so, but cannot now so stipulate. Once we have benefit of the Court's ruling on the plaintiffs' motion on December 3, we can brief the City Council at a closed session on December 8 and then advise the Court if we have authority to do so. Defendant City would suggest either a further Case Management Conference after December 8, perhaps December 15 or, as we have done in the past, the Court might set a date and time by which all parties advise the Court whether they are willing to stipulate to an extension or not.

**Defendant County of Sonoma and Sonoma County CDC's Position**

Defendants County of Sonoma and Sonoma County Community Development Commission (CDC) will defer to the City regarding the need for an evidentiary hearing as to plaintiffs' challenges to the City's enforcement efforts. As to plaintiffs' request for clarification regarding the terms of the Injunction, the County and CDC believe these issues can be resolved by the Court based on the parties' papers and any argument presented during the hearing on plaintiffs' motion.

As to an extension of the Injunction for an additional six months beyond the current expiration date of December 31, 2020, defendants County and CDC are considering plaintiffs' request but cannot stipulate to an extension at this time. Defendants will first need to review the Court's ruling on the plaintiffs' motion to see whether plaintiffs' request for clarification results in any substantial changes to the terms of the Injunction, and subsequently, discuss the matter in closed session once Defendants' have the benefit of the Court's order.

Date: November 10, 2020

CALIFORNIA RURAL LEGAL  
ASSISTANCE, INC.

By: \_\_\_\_\_/s/\_\_\_\_\_

JEFFERY HOFFMAN  
Attorneys for Plaintiffs

Date: November 10, 2020

ROBERT H. PITTMAN, County Counsel

By: \_\_\_\_\_/s/\_\_\_\_\_

MATTHEW R. LILLIGREN  
Attorneys for Defendants  
County of Sonoma; Sonoma County  
Community Development Commission

Date: November 10, 2020

SUE A. GALLAGHER, City Attorney

By: \_\_\_\_\_/s/\_\_\_\_\_

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ECF ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I, Jeffery Hoffman, attest that I have obtained concurrence in the filing of this document from the other signatories to this document.